

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

THOMAS BELL, an individual, and
LIBERTY MEDIA HOLDINGS, LLC, a
California LLC

Plaintiffs,

vs.

ROBERT SCOTT BEAN a/k/a ILNY83

Defendant

Case No.: 2:12-cv-00646

STIPULATED JUDGMENT

INTRODUCTION

Plaintiffs, Thomas Bell and Liberty Media Holdings (Plaintiffs), and Defendant Robert Scott Bean a/k/a ILNY83 (Bean), both hereby consent and agree to this judgment to fully resolve all disputes between them in the above-referenced action. By consent, Plaintiff and Defendant agree to the following findings of fact, conclusions of law, and judgment.

JURISDICTION

This Court has jurisdiction of the subject matter of this action and over each of the parties involved.

BACKGROUND

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2 1. Plaintiffs' claims in this action are for Intrusion Upon Seclusion and Copyright
3 Infringement. Plaintiffs request Injunctive Relief arising from Defendant's intrusion upon
4 Plaintiff Bell's private life.

5 2. Plaintiff Liberty Media Holdings, LLC (LMH) markets and distributes these
6 original works of creative expression through various mediums including Internet web content,
7 DVDs, and photographs of an erotic nature.

8 3. Defendant Bean used copies of LMH's copyrighted works to invade upon
9 Plaintiff Bell's privacy.

10 4. Each of the audiovisual works at issue in this action is registered by the Plaintiff
11 with the United States Copyright Office or has an application for registration pending.

12 5. Defendant Bean copied and distributed the Plaintiff's works.

13 6. Neither Plaintiff nor any other person granted Defendant Bean the authorization
14 to distribute copies of the Plaintiff's copyrighted works.

FIRST CAUSE OF ACTION

(Intrusion Upon Seclusion)

15 7. Defendant Bean disclosed private facts about Bell and intruded upon his private
16 life.

17 8. Bell suffered damages as a result of Bean's actions.

18 9. Plaintiff Bell is entitled to temporary, preliminary, and permanent injunctive relief
19 to enjoin any further such acts on the part of the Defendant Bean.

SECOND CAUSE OF ACTION

(Copyright Infringement 17 U.S.C. § 501)

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21 10. Defendant Bean copied LMH's copyrighted works without authorization.

22 11. LMH either registered the copyrights to each of these works or has submitted the
23 works to the Copyright Office and has registrations pending. LMH and owns exclusive rights
24 and privileges in and to the Copyrights.

25 12. Defendant Bean's conduct infringed upon LMH's Copyrights.

26 13. LMH was damaged by Defendant Bean's conduct, continues to be damaged by
27 such conduct, and has no adequate remedy at law to compensate the Plaintiff for all of the
28 possible damages stemming from the Defendant's conduct.

JUDGMENT

4. This Court shall retain jurisdiction over this case for the purpose of issuing orders consistent with this judgment.

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3 SO ORDERED this ____ day of _____, 2012.
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7 United States District Court Judge

8 FOR THE PLAINTIFFS:

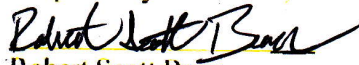
9 Dated: April 24, 2012

10 Respectfully Submitted,


11 Marc J. Randazza
12 Randazza Legal Group
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14 Las Vegas, NV 89118
15 888-667-1113
16 Fax: 305-437-7662

17 FOR THE DEFENDANT:

18 Dated: April 24, 2012

19 Respectfully Submitted,


20 Robert Scott Bean
21 1215 Raptor Drive
22 Hanahan, SC 29410
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27
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